

John Mansfield, OSB No. 055390  
MansfieldLaw  
121 SW Morrison Ave., Suite 400  
Portland, OR 97204  
Telephone: 971.271.8615  
john@mansfieldlaw.net

Jonathan Baker (appearing *pro hac vice*)  
FARNEY DANIELS PC  
411 Borel Avenue, Suite 350  
San Mateo, California 94402  
Telephone: (424) 278-5200  
jbaker@farneydaniels.com

[Additional Counsel listed on signature page]

*Attorneys for Plaintiff Memory Integrity, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

MEMORY INTEGRITY, LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 3:15-cv-00262-SI

**STIPULATION OF THE PARTIES  
REGARDING “SKYLAKE”  
PRODUCTS**

WHEREAS, on February 3, 2016, Plaintiff Memory Integrity, LLC (“MI” or “Plaintiff”) served a Supplemental Identification of Accused Products in this case, which, in addition to the products previously identified, further identified certain of Defendant Intel Corporation’s (“Intel” or “Defendant”) “Skylake” series of processors as products accused by MI of infringing the patents-in-suit;

WHEREAS Intel has disputed the propriety of MI’s addition of the “Skylake” processors as accused products at this stage in this case;

WHEREAS, without conceding their respective positions, the parties wish to enter into this stipulation in order to resolve this dispute without unnecessary motion practice;

MI and Intel, by and through their respective counsel, stipulate as follows:

1. MI withdraws its identification of Intel’s “Skylake” processors as accused products, and MI will not pursue claims of infringement against Intel’s “Skylake” processors in the trial of this action;
2. Intel will not object to a subsequent suit asserting infringement claims against Intel’s “Skylake” products on the ground that such claims should have been included in the current case;
3. Notwithstanding the above, in any subsequent suit against any Intel products (including “Skylake” products), Intel shall have the right to raise any other objection to such suit and to enforce any judgment or ruling against MI arising in this suit to the full extent of any applicable preclusion doctrine, including claim preclusion, issue preclusion, and the *Kessler* doctrine;
4. In any subsequent suit against any Intel products (including “Skylake” products), MI shall have the right to assert any applicable preclusion doctrine against Intel;

5. In any subsequent suit alleging infringement of U.S. Patent Nos. 8,572,206, 8,898,254, 7,296,121, 7,103,636, or 7,107,409 against any Intel products (including “Skylake” products), MI must bring such action in the U.S. District Court for the District of Oregon, and MI will not seek different claim constructions than the constructions that the Court has adopted in this case (as may be corrected, reversed, vacated, or modified by the Court in this case or on appeal of this case).

WHEREFORE, the parties stipulate as set forth above.

Dated: April 5, 2016

Respectfully submitted,

/Jonathan Baker/

Jonathan Baker (appearing *pro hac vice*)  
Michael Saunders (appearing *pro hac vice*)  
Gurtej Singh (appearing *pro hac vice*)  
FARNEY DANIELS PC  
411 Borel Avenue, Suite 350  
San Mateo, California 94402  
Telephone: (424) 278-5200  
jbaker@farneydaniels.com  
msaunders@farneydaniels.com  
tsaunders@farneydaniels.com

Bryan Atkinson (appearing *pro hac vice*)  
FARNEY DANIELS PC  
800 S. Austin Avenue, Suite 200  
Georgetown, Texas 78626  
Telephone: (512) 582-2828  
batkinson@farneydaniels.com

John Mansfield, OSB No. 055390  
MANSFIELDLAW  
121 SW Morrison Ave., Suite 400  
Portland, OR 97204  
Telephone: 971.271.8615  
john@mansfieldlaw.net

*Attorneys for Plaintiff  
Memory Integrity, LLC*

/Arthur W. Coviello/

Renée E. Rothauge, OSB #903712  
MARKOWITZ HERBOLD PC  
Suite 3000, Pacwest Center  
1211 SW Fifth Avenue  
Portland, OR 97204-3730  
ReneeRothauge@markowitzherbold.com

Michael J. Summersgill (*pro hac vice*)  
Jordan L. Hirsch (*pro hac vice*)  
Sarah Beigbeder Petty (*pro hac vice*)  
Alexandra Wells Amrhein (*pro hac vice*)  
WILMERHALE LLP  
60 State Street  
Boston, MA 02109  
michael.summersgill@wilmerhale.com  
jordan.hirsch@wilmerhale.com  
sean.thompson@wilmerhale.com

Grant K. Rowan (*pro hac vice*)  
WILMERHALE LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
Grant.rowan@wilmerhale.com

Arthur W. Coviello (*pro hac vice*)  
WILMERHALE LLP  
950 Page Mill Road  
Palo Alto, CA 94304  
Arthur.coviello@wilmerhale.com

*Attorneys for Defendant  
Intel Corporation*